



FY 19 EPA CW Brownfields Assessment Narrative Information Sheet

January 29, 2019

1. Applicant Identification: Rutland Regional Planning Commission (RRPC),
The Opera House – 67 Merchants Row, Rutland, VT 05701

2. Funding Requested:

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested: \$300,000
- c. Contamination: Hazardous Substances

3. Location: Rutland County, Vermont (includes 27 municipalities);
Target Area for Priority Sites – Rutland City

4. Property Information for Site-Specific Proposals: *Not Applicable*

5. Contacts:

- a. Project Director: Edward Bove, AICP, Executive Director, RRPC – PO Box 965, Rutland, VT 05702; Phone: 802-775-0871 x 208
ebove@rutlandrpc.org
- b. Chief Executive: Edward Bove, AICP, Executive Director, RRPC – PO Box 965, Rutland, VT 05702; Phone: 802-775-0871 x 208
ebove@rutlandrpc.org

6. Population:

- Jurisdiction – Rutland County – Population: 60,530 [US Census ACS 2015]
- Target Area for Priority Sites – Rutland City – Population: 16,091 [US Census ACS 2015]

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7. Other Factors Checklist:

Other Factors	Applicable	Page #
Community population is 10,000 or less.	No	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No	
The priority brownfield sites(s) is impacted by mine-scarred land.	No	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Yes	#2,3 (Creek Path)
The priority site(s) is in a federally designated flood plain.	Yes	#2,3 (Creek Path)
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	Yes	#2,3
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	Yes	#2,3,7-9

8. Letter from State of Vermont: See attached.

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AGENCY OF NATURAL RESOURCES

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
(802) 249-5822
Patricia.coppolino@vermont.gov

January 10, 2019

Rutland Regional Planning Commission
Attn: Mr. Ed Bove
67 Merchants Row
Rutland, Vermont 05701

Dear Mr. Bove,

This letter will serve as acknowledgement that the Vermont Department of Environmental Conservation is aware that the Rutland Regional Planning Commission is intending to apply for Hazardous FY19 federal brownfield grant funds and to use the grant funds, if awarded, to conduct general site assessment activities.

The Vermont Department of Environmental Conservation is appreciative of your intent to support brownfield redevelopment in Vermont. Please know that the Vermont Department of Environmental Conservation is here to support your organization with brownfield redevelopment in the Rutland Region of Vermont.

Good luck in the competition.

Sincerely,

Patricia Coppolino, Environmental Program Manager
Sites Management Section
Waste Management and Prevention Division



1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i.) Background and Description of Target Area – The Rutland Region in southwestern Vermont encompasses 930 square miles and is home to 60,000 people. It is comprised of 27 municipalities and multiple land use types: farms, quarries, villages, industrial sites, and small urban centers. The economic and social hub of Rutland County is **Rutland City, the target community for this grant application.** Rutland City encompasses only 7 square miles, contains approximately 200 hazardous waste sites, and is home to approximately 16,000 people, including, elderly (18%), those living in poverty (17%)^{1,2} and a growing Syrian refugee population.

Rutland City and the region was developed in the 1800s around marble quarrying and the railroad. By the late 1800s Rutland was the railroad center of Vermont and home to Vermont Marble Company, the largest marble business in the world, with multiple complexes in and around Rutland City.³ This spurred the development of several other heavy industries in Rutland City associated with the marble business, many located along the freight rail lines.

Rutland Railroad and these industrial sites started to become abandoned in the 1900s due to the overall decline in industrial activity. The remnants of these uses remain with us today and continue to be the source of outstanding hazardous waste sites in the City and surrounding communities. Despite successful efforts to revitalize the region, the region still contains approximately 500 known hazardous waste sites, approximately 200 in Rutland City. Many simply abandoned and blighted in walkable, mixed use urban areas. Based on property information and our experience executing brownfields work in this region since 2004, we estimate that most of these sites in the City are eligible for brownfield funding.⁴

In the 2012 Art Jones documentary “The Blood in this Town” about the record-setting Gift of Life Marathon Blood Drive, Rutland City is introduced as “...an urban landscape in sharp contrast to Vermont’s picturesque village centers...it is the only ugly town in Vermont.”

ii.) Description of the Priority Brownfield Site(s) – The four priority brownfield sites in Rutland City, our target area, are all located adjacent to or within one block of residences in densely developed mixed-use areas of our downtown. They are all located in two neighborhoods of Rutland City that are home to low-income and elderly residents and are neighborhoods that have recently received state funding for planning and revitalization efforts.

- **Lynda Lee** – an abandoned historic 2-story, 89,000 square on a 1.7 acre city parcel located along the railroad tracks and adjacent to residences in the Northwest Neighborhood of Rutland City. The property was originally developed in the late 1800s for the rail-line industries and was subsequently used for textile manufacturing. The building contains hazardous waste and materials with asbestos and PCBs; and the soil and groundwater are impacted with VOCs and/or PAHs. The vacant, crumbling structure and rubble-strewn property is an environmental and safety hazard. It is located within a half mile of three Rutland City public schools on a common walking route for schoolchildren living in this neighborhood. This property is not in the floodplain or adjacent to water; however, it is only removed from a body of water (East Creek) by a road and one parcel.
- **Berwick Hotel** – former 4-story hotel with street-level shops and a dry cleaner, located on a 1 acre parcel in Rutland City’s historic downtown which is listed on the National Register of Historic Places. The building was destroyed by fire in 1973, leaving an empty, overgrown dirt and crumbling

¹ Agency of Natural Resources Hazardous Waste Sites Environmental Interest Locator.

² US Census, ACS – 2015, Decennial – 2010, 2000, 1990, 1980, 1970.

³ Rutland Historical Society, Seven Eras of Rutland’s History, 1987.

⁴ Agency of Natural Resources Hazardous Waste Sites Environmental Interest Locator.

asphalt lot currently used for parking. The soil is contaminated with asbestos, VOCs, SVOCs, PCBs, arsenic and metals, including lead. This parcel is surrounded by multi-story, mixed use Victorian brownstones with small shops and businesses at street level and businesses/residences above.⁵ This unsightly parcel not only breaks up the aesthetics of historic downtown, it is in a high-pedestrian traffic area, creating contaminant exposure to all visitors.

- **Rutland Creek Path** – This brownfield site is a 1 mile stretch along East Creek between the greenspace of Pine Hill Park and the creek’s confluence with Otter Creek in Rutland City. It is located adjacent to a body of water (East Creek) and in a federally designated floodplain. It passes through the NW Neighborhood and is being developed by the RRPC transportation program and the City of Rutland into a multi-use path. Three of five segments are complete and have included brownfields cleanup work - additional funding will be used to complete the remaining segments.
- **Evelyn Street** – This site along the rail line consists of 6 acres between the Rutland Amtrak Station and the historic downtown small shop retail uses of Center Street (**Berwick Hotel** location). It is currently occupied by weeds and broken glass and concrete. The property needs brownfields funding to implement recommendations from a state and city funded planning grant and available New Markets Tax Credits.

b. Revitalization of the Target Area

i.) Redevelopment Strategy and Alignment with Revitalization Plans – The redevelopment strategies for our four priority brownfield sites are aligned with the City of Rutland Master Plan created through a planning process. The Master Plan is aligned with the Rutland Regional Plan and Vermont land use goals promoting compact centers surrounded by rural/working lands, as well as other statutes requiring multi-modal transportation, affordable housing, energy efficiency and natural resource protection (Title 24).

In addition, all of our priority brownfield sites are located in two critical neighborhoods of Rutland City, the NW Neighborhood and the Evelyn Street Corridor, both of which have recently received Vermont Community Development Program (VCDP) planning grants to conduct studies to support neighborhood redevelopment plans. The Rutland Redevelopment Authority (RRA) is responsible for implementing the funding; they are members of our Brownfield Steering Committee (BSC) and will ensure that the redevelopment strategies align with the City Master Plan and redevelopment planning outcomes.

- **Lynda Lee** – This site located in the NW Neighborhood will be redeveloped into a renewable (solar) energy powered agricultural facility featuring a vertical greenhouse and education center. The site is adjacent to the Vermont Farmers Food Center (VFFC) and connects via public walkway. VFFC is the home to the year-round Farmers Market (the largest in the state) and is currently constructing a larger food aggregation storage facility on site. The facility will soon be able to distribute to larger markets near Boston and New York City; as well as currently serving local school and food assistance providers. The redevelopment of these sites will continue to revive the regional agricultural economy and address agricultural, health and wellness and economic goals of the local and regional plan.
- **Berwick Hotel** – This site located within a block of the Evelyn Street Corridor will be redeveloped into a 4-story mixed residential/commercial building with first floor professional/retail space and modern efficiency, mixed income residences. The redevelopment will remove contaminant exposure risks, improve aesthetics, provide affordable housing and create a larger market for the ground-floor commercial tenants.
- **Rutland Creek Path** – This area along East Creek in the NW Neighborhood is being developed by the RRPC transportation program and the City of Rutland into a public multi-use path. Redevelopment of the path will continue to remove contamination adjacent to the VT DEC

⁵ Rutland Historical Society, Seven Eras of Rutland’s History, 1987.

designated “impaired” Otter Creek, which flows into Lake Champlain (under EPA TMDL requirements), improve the aesthetics of the NW Neighborhood, provide recreational opportunities to residents, connect the VFFC, and bolster the burgeoning recreational-based tourism economy.

- **Evelyn Street** – This site is located within the Evelyn Street Corridor. The redevelopment concept for this site, resulting from the state planning grant, and now a reality with the allocation of New Markets Tax Credits, is a 5-story hotel and conference center with street level commercial space. The plan also calls for closing a portion of Evelyn Street to vehicular traffic and replacing with a public greenspace and gateway promenade linking the Amtrak station and downtown. The redevelopment will remove exposure risks from the abandoned lot, add greenspace for the adjacent residential neighborhoods and enhance the visitor experience to downtown Rutland.

ii.) Outcomes and Benefits of Redevelopment Strategy – Redeveloping these priority brownfield sites will stimulate economic development by providing desirable space for new business at **Berwick Hotel** and **Evelyn Street** and further improving the aesthetics of these existing business districts. New businesses would boost the number of jobs in the city and increase tax revenues and property values, as has been evidenced with other developments in the region. **Evelyn Street** project will provide visitor accommodations and public greenspace in the walkshed of sensitive populations. **Berwick Hotel** will provide mixed-income housing, making the development sustainable regardless of tourism impacts. Redevelopment of the **Rutland Creek Path** will increase the accessibility and recreation options for visitors and residents and address community health and wellness goals such as reducing obesity. Remediating these Brownfield sites will improve city aesthetics, remove health hazards, provide visitor accommodations and connect public walkways with greenspace and public transportation which are vital to economic development. The **Lynda Lee** redevelopment with solar powered agricultural facility and energy efficient vertical greenhouse will allow the VFFC to grow by leaps and bounds. The new facility could add up to 10 jobs associated with the growing and distribution of agricultural products, now from a central location in Rutland City. Recently, a maple syrup distributor relocated his operations to the VFFC adding 3 jobs. The redevelopment will allow replace blight with a regional facility, including education center, which will focus on agricultural-based economies and employment. Redevelopment of these brownfields sites provides an opportunity to incorporate energy efficient construction and renewable energy infrastructure into the site development. A goal of the City Master Plan and Rutland Regional Plan is to promote LEED certification for buildings and neighborhoods. Assisting projects achieve these standards is a mission of Green Mountain Power (GMP), one of our Community Partners that holds a seat on our BSC.

c. Strategy for Leveraging Resources

i.) Resources Needed for Site Reuse – A majority of the funding under this grant will be used on Phase I and II ESAs and Cleanup Plans, which help leverage other funding for cleanup and redevelopment. For our previous EPA community-wide assessment grants, RRPC secured funding from the following and we intend to seek funding from each of these again to supplement this proposal: VT Agency of Commerce and Community Development, VT Agency of Transportation, Vermont Community Development Program (VCDP), Rutland Economic Development Corporation (REDC), Rutland Redevelopment Authority (RRA), Rutland Downtown Partnership (DRP), local municipalities, non-profits and private property owners; and we continue to maintain relationships with all of these organizations to leverage additional funding for new projects.

Specifically, we have secured in-kind and cash donations from 19 local businesses and numerous individuals totaling \$330k for the **Rutland Creek Path**. The RRA has pledged \$30,000 for the **Evelyn Street** redevelopment, including in-kind staff planning work and has secured \$1.2M under the NW Neighborhood VCDP implementation grant (which includes **Lynda Lee**). The VFFC has pledged approximately \$500,000 for site cleanup and redevelopment soft costs at **Lynda Lee**. The Rutland

Downtown Partnership and City of Rutland have pledged over \$100,000 in grant matching funds at **Berwick Hotel**.

Two businesses that are actively investing in redevelopment in Rutland City and may provide additional funding include:

- Castleton University, located 15 miles west of Rutland City, is a significant partner in downtown Rutland economic development initiatives. They provide funds to REDC and are actively seeking student housing opportunities in our downtown neighborhoods.
- Green Mountain Power provides electricity to 75% of Vermont. They have launched several alternative energy projects on redeveloped brownfields sites in Rutland City and aim to make Rutland the solar capital of New England.⁶

ii.) Use of Existing Infrastructure – All four redevelopment projects are infill projects within the existing urban fabric of a walkable, connected and human-scaled street network, adjacent to the historic and architecturally significant private mixed uses. The sites will make use of existing Rutland City infrastructure including water/sewer, power, utilities and transportation (with the exception of the Rutland Creek Path that does not require utilities). It is the maintenance of the existing infrastructure that make the sites attractive for redevelopment. The additional tax revenue to the city from these developments can be spent on infrastructure which will facilitate future redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i.) The Community's Need for Funding – Rutland City, once the largest city in Vermont, suffers from the effects of decades of industrial loss and population decline. Residents that remain are retired (18% over age 65, above state and national averages) or employed at low-paying jobs and challenged by difficult economic conditions as evidenced by Rutland City's poverty rate and income data below.

Demographic Indicator	Rutland City	Vermont	National
Poverty Rate	17.1%	11.5%	15.5%
Median Household Income	\$41,345	\$55,176	\$53,889
Food Stamps/SNAP	18%	13.1%	12%

Source: US Census, ACS, 2015

The pull-out of the marble- and railroad-based industries meant a loss of jobs and tax revenues for the municipalities, all while leaving a region blighted with abandoned reminders of the past. Rutland City must maintain and upgrade infrastructure that was built for a population of 20,000, the cost of which is shouldered by the 16,000 that remain. For example, in order to meet current environmental standards, it has been estimated that it will cost Rutland City \$160 million to upgrade their combined stormwater/sewer system, leaving limited resources for brownfields. Significant efforts have been made to revitalize the region, but recent assessments show that jobs in the city and property values are still below 2008 levels. Also, since 2000 a total of eight significant storms, all Declared Federal Disasters, have hit the region causing over \$1.8 million in flooding and wind damage in Rutland City alone. The most significant of these events was the August 2011 Tropical Storm Irene which caused widespread flooding across the region, damaging critical infrastructure. A total of 285 roads and 35 bridges in Rutland County were reported to have sustained damage, requiring repair or replacement. Rutland City suffered over \$1.5 million in reported damage from the storm.

In the coming year, Rutland City will be welcoming approximately 80 more Syrian refugees into our community. Housing this population in Rutland City will create an even greater demand for a clean environment, safe/affordable housing, accessible transportation, and quality jobs.

⁶ Improving Community Health Through Volunteerism, ASTDR, Laurel Berman PhD, EPA Region 5. 2013.

ii.) Threats to Sensitive Populations –

(1) Health or Welfare of Sensitive Populations – Rutland County’s sensitive populations include low-income and elderly residents, families with young children, women of child-bearing age, minorities, and a growing Syrian refugee population. Several welfare measures illustrate the challenges they face:

- Since 1989 the percent of children in Rutland County living in poverty has increased, while state numbers have dropped. Over 20% of the young children (ages 0-4) living in Rutland City receive welfare, that is twice the state average (9.1%). For older children (ages 5-17), 2.6 times as many received welfare as in the state.⁷
- Rutland County has a significant wage gap with respect to gender. Female full-time, year-round workers earn \$7,000 less than male full-time, workers. Subsequently, 35% of families with a female head of household and children under age 5, live in poverty.⁸
- Minorities are disproportionately affected by the tough economic conditions. County-wide, the median household income for African American and Hispanic residents is \$8000 lower; and a larger percentage of minorities live below the poverty line – 20% of Whites versus 52% of African Americans, 32% of Asians, and 30% of Hispanics.⁹

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions – Because of the dense, walkable, mixed-use development pattern of the city, sensitive populations in Rutland City, live and work in old housing and near brownfield sites with potential contamination. Children, college students, residents and business owners walk by **Lynda Lee, Evelyn Street** and **Berwick Hotel** daily. These are abandoned brownfield sites with rubble piles that invite dumping, and with soil contamination stemming from the railroad industries (PAHs), historic fires (lead and other metals, dioxins), and industrial activities (asbestos, PCBs, VOCs, SVOCs), all of which are known health hazards. The following statistics from the *2017 County Health Rankings* and the *2019 Rutland Regional Medical Center Community Health Needs Assessment* demonstrate Rutland County’s challenges with respect to community health, conditions which may be associated with exposure to contaminants:^{10,11}

- Rutland County is ranked 3rd lowest of all counties in Vermont for overall health factors, and 2nd lowest in Vermont for the physical environment category based on air pollution, drinking water violations, and severe housing problems.
- 11% of children and 14% of adults in Rutland County have asthma (a condition associated with exposure to contaminants), 3-4% higher than the state average and higher than the national average.
- From 2005–2015, 18% of Rutland County children who were tested had elevated blood lead levels, which may be partially attributable to lead exposure at brownfield sites. Assessing and remediating these sites will eliminate this potential exposure pathway.
- Several specific health behaviors are higher in Rutland County than in the State of Vermont: obesity rates (adult 30% vs. 25%), percent of smokers (adult 22% vs. 17%), amount of physical inactivity (22% vs 19%), and teen births (21 vs. 17 per 1,000).

By providing alternate transportation options, the **Rutland Creek Path** will reduce air pollution from automobile traffic, which is a known asthma trigger, and will increase access to recreational and exercise opportunities, which can increase physical activity and reduce obesity. This same holds true

⁷ Community health assessment <http://www.cherr.org/wp-content/uploads/2016/06/community-health-needs-assessment-2015-2017.pdf>

⁸ 2007 Community Profile for the Community served by the Rutland City School District. VT Agency of Human Services

⁹ Vermont Economic and Demographic Profile Series: 2007

¹⁰ County Health Rankings – Vermont, Robert Wood Johnson Foundation and University of Wisconsin Population Health Institute. www.countyhealthrankings.org. 2017.

¹¹ Community Health Needs Assessment, Rutland Regional Medical Center, effective October 1, 2019.

for the addition of downtown residents at **Berwick Hotel**. The **Lynda Lee** Redevelopment will provide healthy food options within walking distance of residential neighborhoods now considered food deserts.

(3) Economically Impoverished/Disproportionately Impacted Populations – Rutland City residents and sensitive populations are economically impoverished (demonstrated above). Because our brownfield sites are located in critical mixed-use areas of the city, they are exposed daily to the health and environmental hazards within our neighborhoods.

- According to the 2010 census, 44% of Rutland City residents rented (greater than the state average of 23%). Many of these renters are from low income households – in 2010, 46% of Rutland County renters paid at least 30% of their income to rent and an additional 22% paid more than 50%¹²
- Housing in Rutland City is much older than across the state; the median year of construction is 1947.¹³ This presents a significant health hazard to the community – 82% of renter-occupied units and 68% of owner-occupied units in Rutland County have lead paint issues¹⁴ which is likely contributing to the high blood lead levels in so many children in our community (18%). The **Berwick Hotel** redevelopment will include 25 units of mixed-income housing and could provide up to 20 jobs in the modern first floor commercial space. All four redevelopment projects will improve safe and healthy access to services, while addressing the past disinvestment at these sites.

b. Community Engagement

i.) Community Involvement – The RRPC is by nature and operation, a collaborative agency. The local community-based organizations which work with us represent a broad spectrum of local interests. All of these organizations serve on our BSC which assists in site selection and contractor procurement, and all have a local volunteer board, educating and engaging communities through their work.

Partner Name	Description	Point of Contact	Specific Role in the Project
Rutland Economic Development Corp. (REDC)	Non-profit partially funded by Castleton University. Offers a loan program to support small businesses and provide technical assistance.	Tyler Richardson, Executive Director Tyler@rutland economy.com 802-773-9147	<ul style="list-style-type: none"> • Member of BSC • Refer potential sites • Job placement services • Finance economic development planning
Housing Trust of Rutland County (RHT)	Non-profit housing developer for affordable housing and mixed-use projects.	Elisabeth Kulis, Executive Director Ekulas@housing Rutland.org 802-775-3139	<ul style="list-style-type: none"> • Member of BSC • Develop the Berwick Hotel • Member of cleanup committee
Downtown Rutland Partnership (DRP)	Non-profit dedicated to the economic prosperity of Rutland City; supports activities that improve the vitality of the business community and enhance the cultural and physical climate.	Steve Peters, Executive Director Speters@rutlanddowntown.com 802-773-2910	<ul style="list-style-type: none"> • Member of BSC • Services to support existing and potential downtown businesses • Host public meetings/design charrettes
Rutland Redevelopment Authority (RRA)	Rutland City department that redevelops properties, manages planning efforts and implements City Master Plan.	Brennan Duffy, Executive Director duffyrra@rutlandbt.com	<ul style="list-style-type: none"> • Member of BSC • Implement Evelyn Street Corridor VCDP grant

¹² Rutland Vermont Housing Needs Assessment and Market Study. Community Development Consulting, 2012

¹³ US Census, ACS – 2015, Decennial – 2010, 2000, 1990, 1980, 1970.

¹⁴ Community Health Needs Assessment, Rutland Regional Medical Center, effective October 1, 2019.

		business.com 802-775-2910	<ul style="list-style-type: none"> • Implement NW Neighborhood VCDP grant
Project VISION	Coalition of social and health service and law enforcement agencies, businesses, the City, schools and residents. Mission to address substance abuse, reduce crime and improve neighborhoods.	Commander, Mathew Prouty, Rutland City Police Department mprouty@rutlandpd.org 802-558-0038	<ul style="list-style-type: none"> • Member of BSC • Provide staff and community organization collaboration space • Translate information for and connect with Syrian refugees
Neighborworks of Western VT	Provides education, technical assistance and financial services for safe, efficient and stable housing and community projects within Rutland County.	Ludy Biddle, Executive Director Luddy@nwwvt.org 802-438-2303	<ul style="list-style-type: none"> • Member of BSC • Provide technical/ financial assistance • Educational materials • Implement NW Neighborhood VCDP grant with RRA

ii.) Incorporating Community Input –The RRPC and our Community Partners will involve the community and promote dialogue on the Brownfields program and projects through:

- **Face-to-face public meetings:** Includes Kickoff Meeting for the new grant; Quarterly BSC Meetings; Project-Specific Meetings for each project (held in its neighborhood during all phases of work). Meetings will be advertised and open to the public, and will be coordinated with and attended by our community partners. During meetings, project progress will be discussed, public translation services will be provided, and community input will be solicited and responded to.
- **Publicly-distributed paper information:** Information regarding the grant and project-specific progress will be mailed to residents/ businesses yearly; this includes the initial Brownfields Fact Sheet. Regular press releases will be published in the local newspapers.
- **Publicly-accessible electronic information:** Grant and project-specific information and responses to public comment will be disseminated through the RRPC website, Constant Contact, Instagram and Facebook. Public feedback will be solicited through social media. ProjectVISION will facilitate communications with our Syrian refugee community and other non-English speaking residents.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks and Activities

A majority of the proposed budget will be spent on Phase I and Phase II ESAs and Cleanup Plans. The RRPC Executive Director, Ed Bove, will be responsible for implementing and completing activities under this funding. The RRPC has an established BSC that includes representation from multiple community interests. This committee assists in site identification/selection and contractor procurement.

Task 1 – Cooperative Agreement Oversight; Lead – RRPC: The RRPC will manage all financial, reporting and auditing tasks required of the Brownfield program. RRPC staff will oversee the cooperative agreement, manage QEPs; support, train, and coordinate the BSC; and coordinate among stakeholders. The RRPC GIS analyst will maintain and update the site inventory database. RRPC staff will attend statewide meetings, regional workshops, and the EPA National Conference.

Site Inventory Prioritization and Selection: Sites are typically brought to the RRPC through local knowledge of the program and its successes. We also currently have a list of sites that could be eligible for assessment funding. Sites are evaluated by the Project Manager and the BSC and enrolled in the Brownfields program if they are located in Rutland City or village centers in mixed residential/commercial areas of sensitive populations; they are viable for redevelopment by businesses

to bring jobs to the region; and/or they will improve the aesthetic qualities of a neighborhood and not contribute to low density auto-centric inefficient land development patterns.

Obtaining and Securing Site Access: The RRPC already has access agreements in place for all four priority brownfield sites. For any additional sites, we will use the templates we have developed from our previous brownfields work to aid us in drafting new access agreements.

Contractor Procurement: All professional environmental services and legal assistance will be obtained through RRPC's state- and federally-approved competitive procurement process. The RRPC will procure a Qualified Environmental Professional (QEP) by issuing a Request for Qualifications (RFQ) (which is reviewed by VT DEC and EPA) to potential subcontractors identified through previous assessment work and our knowledge of the local business community. Contractor Statements of Qualifications are evaluated based on responsiveness to the RFQ, past performance, references, and other criteria. A total of approximately 3-4 QEPs will be selected for our pre-qualified pool and will be awarded work based on qualifications, experience and availability. From our previous experience executing brownfields assessment contracts, we have developed templates for use in procurement.

Additional funding: In order to manage the Cooperative Agreement, RRPC will contribute in-kind funding to cover overhead administrative costs, not covered by this grant, although the RRPC is grateful to EPA that Indirect can now be included. In addition, services of the RRPC Financial Manager to perform financial reporting and auditing are contributed by the RRPC.

Task 2 – Community Outreach and Engagement; Lead – RRPC: The RRPC staff will coordinate with our community partners to perform the following: at the onset of the grant, prepare and distribute a Brownfields Fact Sheet and outreach packet describing the program to local/regional partners; conduct one Kickoff Meeting for the grant; conduct 12 quarterly meetings with the BSC; conduct 5 public meetings in towns where site assessment work is being performed; update the Brownfields Program webpage weekly (highlighting current events); update the FTP site as needed (public access to large files such as ESAs); issue constant contact blasts and update our Instagram and Facebook as needed; conduct 6-8 meetings with municipalities, property owners and potential developers to explain the program; enlist support for site assessment and gain permission for site access; publish regular press releases to local newspapers; and share educational materials through social media.

Task 3 – Phase I and II Site Assessment Activities; Lead – RRPC: QEPs selected through the RRPC procurement process will conduct Phase I and II ESAs (including Quality Assurance Project Plans) in accordance with ASTM, VT DEC and EPA standards. The RRPC staff will manage the QEPs, maintain budget and schedule, coordinate field activities with property owners, and review all work products.

Task 4 – Cleanup and Reuse Planning; Lead – RRPC: QEPs selected through the RRPC procurement process will conduct reuse and remediation planning in cooperation with stakeholders. The RRPC staff will manage the QEPs, maintain budget and schedule, coordinate with stakeholders and review all work products. The RRPC staff will also assist property owners in identifying additional redevelopment resources, work with local organizations to market remediated sites, and assist property owners of enrolled sites in preparing funding applications.

b. Cost Estimates and Outputs

Our plan for allocating grant funds for these four tasks is shown in the table below.

Budget Categories	Project Tasks				Total
	Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach and Engagement	Task 3 Phase I & Phase II ESAs	Task 4 Cleanup and Reuse Planning	

Personnel	3,550	7,600	12,180	8,980	32,310
Travel	3,000	290	580	290	4,160
Supplies	275	885	275	275	1,710
Contractual (QEP)	0	0	170,000	90,000	260,000
Total Direct Costs	8,490	10,880	188,600	89,710	298,180
Indirect Costs	325	395	635	465	1,820
Total Budget	7,150	9,170	183,670	100,010	300,000

Personnel Rate = Salary + Fringe. Rates based on previous management of EPA Assessment funding.

Indirect Rate = 5% of Personnel + Travel.

Task 1 – Cooperative Agreement Oversight: RRPC Personnel (\$3,550) = Project Manager 40hrs x \$60/hr. + Project Coordinator 25hrs x \$36/hr. + GIS Manager 5hrs x \$50/hr. Travel (\$3,000) = airfare/lodging/per diem for one person to Brownfields Conference Supplies (\$275) = Postage, copies meeting, and printed educational and training materials.

Outputs: Brownfields file management at RRPC, staff/BSC training, contracts with QEPs to conduct assessments and remediation planning, associated site forms and access agreements, 11 quarterly reports (including mbe/wbe and ACRES), one final report (including mbe/wbe and ACRES).

Task 2 – Community Outreach and Engagement: RRPC Personnel (\$7,600) = Project Manager 80hrs x \$60/hr. + Project Coordinator 50hrs x \$36/hr. + GIS Manager 20hrs x \$50/hr. Travel (\$290) = local travel (500 miles x \$0.58/mile). Supplies (\$885) = Same as Task 1, plus program advertising and educational materials (printed and via social media), presentations to the BSC, and ESA outreach materials.

Outputs: 12 Brownfields Steering Committee meetings, updated social media/FTP content, meetings with potential stakeholders, and public meetings between project phases.

Task 3 – Phase I and II Site Assessment Activities: RRPC Personnel (\$12,180) = Project Manager 130hrs x \$60/hr. + Project Coordinator 80hrs x \$36/hr. + GIS Manager 30hrs x \$50/hr. Travel (\$580) = local travel (1000 miles x \$0.58/mile). Supplies (\$275) = phone calls, postage, copies, appropriate clothing for site visits. Contractual (\$170,000) = QEP perform 5 Phase I ESAs x \$4,000/ea. + 3 Phase II ESAs x \$50,000/ea. These costs are based on our past experience conducting Phase I and Phase II ESAs in Rutland County and the nature/size of the anticipated sites.

Outputs: 5 Phase I ESAs (**Rutland Creek Path, Evelyn Street, Berwick Hotel**, other potential sites) and 3 Phase II ESAs (**Lynda Lee, Berwick Hotel, Evelyn Street**).

Task 4 – Cleanup and Reuse Planning: RRPC Personnel (\$8,980) = Project Manager 100hrs x \$60/hr + Project Coordinator 55hrs x \$36/hr. + GIS Manager 20hrs x \$50/hr. Travel (\$290) = local travel (500 miles x \$0.58/mile). Supplies (\$275) = Same as Task 3. Contractual (\$90,000) = QEP perform 3 Phase III Remediation Plans x \$30,000/ea.

Outputs: 3 Phase III Remediation Plans (**Berwick Hotel, Lynda Lee, Evelyn Street**).

c. Measuring Environmental Results

The RRPC plans to track, measure and evaluate our progress by producing 11 quarterly reports and updating the ACRES database on all project activities. Based on our previous experience executing EPA Brownfields grants and our identified Rutland City Brownfields sites, we anticipate completing 5 Phase I ESAs, 3 Phase II ESAs and 3 Phase III Remediation Plans, bringing up to 3 sites to productive reuse within the three-year period. Project progress will be documented in the RRPC database and the workplans and final reports for each project. We will work with QEPs to ensure project schedules are met, identify/mitigate potential project holdups and critical paths, and establish contingency plans.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i.) Organizational Structure – The RRPC has successfully executed 8 EPA community-wide assessment grants in Rutland County since 2004. All project work will be overseen by the RRPC’s Executive Director and Brownfields Program Manager, Ed Bove, AICP, who has managed 6 of those previous grants and will be responsible for implementing and completing activities under this funding. Ed has over 16 years of experience in Vermont land use planning and economic development projects, with 9 years dedicated to managing the Brownfields Program. For this grant, he will be responsible for the timely and successful expenditure of funds and ensuring that all technical, administrative and financial requirements are met. He will meet with community partners, oversee selection of Brownfields sites for assessment funding, contract and manage QEPs, review all ESAs and remediation plans, complete and submit all grant-required forms and submissions, and with assistance from the BSC will seek and select sites for inclusion into the program. Importantly, he will integrate the Brownfields program with other RRPC programs such as land use planning, emergency management and economic development.

Project Coordinator Steffanie Bourque has 20 years of experience in state/federal grant management, land use planning and infrastructure development programming. She will provide assistance in completing the administrative requirements of the grant. Additional staff that will provide technical expertise in executing the contract include Steve Schild, GIS Manager (26 years experience), and Mary Kay Skaza, Finance Manager (16 years experience).

ii.) Acquiring Additional Resources – All professional environmental services, legal assistance and pro-bono contributions to the project from community partners will be obtained through RRPC’s state- and federally-approved competitive procurement process. From our experience executing brownfields assessment contracts, we have developed templates for the RFQs, an evaluation scoring form, and subcontracts, which we will use to expedite this process. We will procure a QEP by issuing a RFQ (which is reviewed by VT DEC and EPA) to potential subcontractors. Contractor Statements of Qualifications will be evaluated based on responsiveness to the RFQ, past performance, references, and other criteria.

b. Past Performance and Accomplishments

i.) Currently Has or Previously Received an EPA Brownfields Grant –

(1) Accomplishments – The RRPC has received 8 community-wide (CW) assessment grants since 2004. Our three most recent projects included:

- 2014 CW Assessment for Hazardous Substances (Haz. Sub.); Total Budget \$200,000; successfully completed and closed out in 2017; 6 sites assessed; 1 site cleaned up/ reused and 1 in redevelopment.
- 2012 CW Assessment for Haz. Sub.; Total Budget \$200,000; successfully completed and closed out in 2015; 5 sites assessed; 2 sites cleaned up/ brought to reuse and 1 in redevelopment.
- 2010 CW Assessment for Haz. Sub.; Total Budget \$200,00; successfully completed and closed out in 2012; 5 sites assessed; 1 site cleaned up/ brought to reuse.

These outputs and outcomes are accurately reflected in the ACRES as of the date of this proposal.

(2) Compliance with Grant Requirements – The RRPC has been in full compliance with all Cooperative Agreements and current/past workplans including EPA’s requirements for submitting timely quarterly progress reports, ACRES, MBE/WBE, procurement, and other financial reporting. We have completed 26 Phase I ESAs, 13 Phase II ESAs, and fully redeveloped 8 sites efficiently and on schedule and will draw on that experience for this award. For all previous EPA Brownfields grants, the funds were fully expended. We currently do not have any open EPA Brownfields grants.

III.B. Threshold Criteria for Assessment Grants

1. Applicant Eligibility

The Rutland Regional Planning Commission (RRPC) is a Regional Council/General Purpose Unit of Local Government established within the State of Vermont to conduct regional planning activities and provide technical assistance to the 27 municipalities in our region. As such the RRPC meets the eligibility requirements listed in Section III A. of the FY19 Proposal Guidelines for Assessment Grants.

Regional Planning Commissions are considered political subdivisions of the State of Vermont. The Board of Commissioners of the organization has representatives from all 27 municipalities in the Rutland Region and other local officials from various organizations.

The RRPC has a long history of working with the communities in our region. As the Regional Planning Commission for Rutland County we provide land use, emergency management, natural resource, economic development, energy and transportation planning services. In addition, we provide extensive GIS database development and mapping for our member communities.

See attached.

2. Community Involvement

Community outreach and engagement is described in the narrative proposal below. **2. Community Need and Community Engagement**, **b. Community Engagement** describes community involvement for the entire Brownfields Program of the RRPC. **3. Task Descriptions, Cost Estimates and Measuring Progress**, **Task 2 – Community Outreach and Engagement** describes involvement specific to enrolled sites.

3. Expenditure of Assessment Grant Funds

The RRRPC is not a current EPA Brownfields Assessment Grant recipient.

MAR 30 1982



STATE OF VERMONT
OFFICE OF THE ATTORNEY GENERAL
MONTPELIER
05602

June 13, 1968

Mr. Edwin C. Gallison
Director of Social Security
Office of the State Treasurer
Montpelier, Vermont 05602

Dear Mr. Gallison:

The Attorney General has referred to me your letter dated June 5, 1968, regarding the status of a regional planning commission as "a separate political subdivision, an integral part of one or more political entities, or a private non-profit organization." I believe of the three, a regional planning commission organized under Sections 2923 through 2931 of Title 24 V.S.A., or under the provisions of Subchapter 3 of No. 334 of the Acts of 1968, is a "separate political subdivision."

Please let me know if I can be of any further assistance.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jonathan N. Brownell".

JONATHAN N. BROWNELL
Deputy Attorney General

JNB/lmg

Address any reply to: 11 Elmwood Ave., Burlington, Vt. 05401

US Treasury Department



District Director

Internal Revenue Service

Date:

In reply refer to:

December 23, 1968 AU:R

▷ Chittenden County Regional
Planning Commission
The Village
Richmond, Vermont 05477

Gentlemen:

We refer to your letter of December 12, 1968, requesting a determination on your status in regard to Federal income tax.

Section 115 of the Internal Revenue Code provides in part that gross income does not include income derived from the exercise of any essential governmental function and accruing to a State or Territory or any political sub-division thereof.

You were originally established under the authority of Chapter 65 of Title 24 V.S.A., and your present and continuing existence is authorized by Chapter 91 of Title 24 V.S.A. Your powers and duties, as set forth in Section 4345 of Chapter 91, are essentially in connection with governmental functions. Also, on December 6, 1968, the Assistant Attorney General to the State of Vermont ruled that your organization is a political sub-division of the State of Vermont.

Since the Chittenden Regional Planning Commission is a political sub-division of the State of Vermont, you are not liable for filing of any Federal income tax returns.

This is a determination letter.

Very truly yours,

Fulton W. Fields

District Director

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/30/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Rutland Regional Planning Commission

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

6274979850000

d. Address:

* Street1:

P.O. Box 965

Street2:

* City:

Rutland

County/Parish:

* State:

VT: Vermont

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

05702-0965

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Edward

Middle Name:

* Last Name:

Bove

Suffix:

Title:

Executive Director

Organizational Affiliation:

* Telephone Number:

8027750871

Fax Number:

* Email:

ebove@rutlandrpc.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

E: Regional Organization

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Rutland Region Brownfields Reuse Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: